

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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INTEGRATED HEALTH SERVICES OF  
CLIFF MANOR, INC., INTEGRATED  
HEALTH SERVICES AT RIVERBEND,  
INTEGRATED HEALTH SERVICES AT  
SOMERSET VALLEY, INC., ALPINE  
MANOR, INC., BRIARCLIFF NURSING  
HOME, INC., INTEGRATED HEALTH  
GROUP, INC., SPRING CREEK OF IHS, INC.,  
FIRELANDS OF IHS, INC., ELM CREEK OF  
IHS, INC., and IHS LONG TERM CARE  
SERVICES, INC.,

Plaintiffs,

v.

THCI COMPANY LLC,

Defendant,

v.

ABE BRIARWOOD CORPORATION and  
JOHN DOES 1-10,

Additional Counterclaim  
Defendants.

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Civil Action No. 04-910 (GMS)

**NOTICE TO TAKE DEPOSITION OF A NON-PARTY CORPORATION**

PLEASE TAKE NOTICE that defendant THCI Company LLC will take testimony by deposition, upon oral examination, before a person authorized by the laws of the State of New York to administer oaths, on August 9, 2006, commencing at 2:00 p.m. at the office of Pitney Hardin LLP, 7 Times Square, New York, NY 10036-7311 and on any adjourned date thereof, and from day to day thereafter until completed, with respect to the subject matter of this action, at which time and place the deposition of a representative of Credit Suisse First Boston, Inc. ("CSFB") will

be taken in accordance with the attached Subpoena Duces Tecum. As counsel for Plaintiffs you are invited to attend and cross-examine.

The person or persons that may be designated by CSFB in accordance with Fed. R. Civ. P. 30(b)(6) and 45 should have knowledge of the facts, circumstances, and background relating to (1) ABE Briarwood Corporation's ("Briarwood") acquisition of the shares of IHS Long Term Care Services, Inc. ("LTC"), (2) financing or lending provided to or on behalf of Briarwood or LTC, and (3) the transfer of any assets from Briarwood, LTC, and/or any of the other Plaintiffs in this case to any other party since August 2003.

PLEASE TAKE FURTHER NOTICE that, on August 9, 2006, at the location above, CSFB has been directed to produce each of the documents specified in the attached Subpoena Duces Tecum.

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Kevin F. Brady

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DATED: July 27, 2006

**CERTIFICATE OF SERVICE**

I, Kevin F. Brady, hereby certify that on the 27<sup>th</sup> day of July, 2006 a true and correct copy of the Notice to Take Deposition of a Non-Party Corporation was caused to be served by electronic mail on the attorney of record at the following address:

Richard William Riley, Esquire  
Duane Morris LLP  
1100 North Market Street  
Suite 1200  
Wilmington, DE 19801

/s/ Kevin F. Brady  
Kevin F. Brady (Bar No. 2248)